

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

FORD MOTOR COMPANY)	
)	
Plaintiff,)	
)	Civil Action No. 3:12-cv-839
v.)	
)	
NATIONAL INDEMNITY COMPANY)	
)	
Defendant.)	

**STIPULATED PROTECTIVE ORDER
REGARDING DISCOVERY FROM JOHN YACOUB**

WHEREAS Defendant National Indemnity Company ("NICO") has named John Yacoub on its Fed. R. Civ. P. 26(a)(1) disclosures as a witness it may call at trial;

WHEREAS Plaintiff Ford Motor Company ("Ford") has requested deposition testimony from Mr. Yacoub;

WHEREAS Mr. Yacoub has agreed to appear voluntarily for such deposition subject to the conditions set forth below; and

WHEREAS, Ford and NICO (collectively the "Parties") agree to these conditions in consideration of the time and expense Mr. Yacoub's voluntary appearance will save the Parties as compared to seeking a formal subpoena for his appearance;

IT IS HEREBY STIPULATED AND AGREED THAT:

1. Nothing with respect to Mr. Yacoub's agreement to cooperate with, or his participation involving, depositions under the auspices of this action shall be construed as HDI-Gerling Industrie Verischerung AG's ("HDI-Gerling") consent to the jurisdiction of this Court for any reason;

2. The law firm of Quinn Emanuel Urquhart & Sullivan LLP ("Quinn Emanuel") may represent Mr. Yacoub with respect to any and all matters concerning Mr. Yacoub's agreement to cooperate with respect to depositions in this action, and nothing about this representation shall be construed as Mr. Yacoub's or HDI-Gerling's consent to, or waiver of their right to challenge, the jurisdiction of this Court for any reason;
3. By cooperating with these depositions, HDI-Gerling is not making an appearance in this Court, and Mr. Yacoub and HDI-Gerling do not consent to the jurisdiction of this Court.

Dated: June 11, 2013

FORD MOTOR COMPANY

By: 

Scott C. Oostdyk (VSB#28512)
soostdyk@mcguirewoods.com
J. Tracy Walker (VSB#31355)
twalker@mcguirewoods.com
H. Carter Redd (VSB#34392)
hredd@mcguirewoods.com
Matthew D. Fender (VSB#76717)
mfender@mcguirewoods.com

One James Center
901 E. Cary St.
Richmond, VA 23219
Tel: (804) 775-1000
Fax: (804) 775-1061

Counsel for Ford Motor Company

NATIONAL INDEMNITY COMPANY

By: 

George P. Sibley, III (VSB No. 48773)
gsibley@hunton.com
Hunton & Williams LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
(804) 788-8200

Walter J. Andrews (VSB No. 46031)
wandrews@hunton.com
Michael S. Levine (VSB No. 48013)
mlevine@hunton.com
Hunton & Williams LLP
1751 Pinnacle Drive
Suite 1700
McLean, Virginia 22102
(703) 714-7400

Jane M. Byrne (*pro hac vice*)
janebyrne@quinnemanuel.com

Corey Worcester (*pro hac vice*)
coreyworchester@quinnemanuel.com
J. Toji Calabro (*pro hac vice*)
tojicalabro@quinnemanuel.com
Brad Evan Rosen (*pro hac vice*)
bradrosen@quinnemanuel.com
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

*Attorneys for Defendant,
National Indemnity Company*

So Ordered.

Robert E. Payne
Senior United States District Judge